

NO. 2019-61060

**DONALD B. JOHN-MILLER,
INDIVIDUALLY AND D/B/A
EDAM GBERE INTERNATIONAL
SERVICES,
EDAM GBERE NIGERIA LIMITED,
D1 INTEGRATED SERVICES,
and,
CAROLINE MARINE SERVICES, LTD.**

IN THE DISTRICT COURT

165TH JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

vs.

**AUSTIN HOWELL, INDIVIDUALLY,
TIDEWATER MARINE
INTERNATIONAL, INC., and
TIDEWATER MARINE, LLC**

NOTICE OF FILING NOTICE OF REMOVAL TO FEDERAL COURT

TO: The Honorable Marilyn Burgess
District Clerk of Harris County
201 Caroline, Suite 420
Houston, Texas 77002

Plaintiff, Donald B. John-Miller,
individually and D/B/A Edam Gbere
International Services, Edam Gbere
Nigeria Limited, D1 Integrated Services,
and Caroline Marine Services, Ltd.

Through Plaintiff's counsel of record
Toby C. Easley
EASLEY LAW FIRM, PLLC
1214 Elgin Street
Houston, Texas 77004

| |
|----------------------------|
| EXHIBIT C |
|----------------------------|

PLEASE TAKE NOTICE that on the 30th day of September, 2019, Defendant, Tidewater Marine, LLC, pursuant to 28 U.S.C. § 1332, 28 U.S.C. § 1441 and 28 U.S.C. § 1446, filed with the office of the Clerk of the United States District Court for the Southern District of Texas, a Notice of Removal of the above referenced and numbered action now pending in the 165th Judicial District Court for Harris County, bearing Civil Action No. 2019-61060.

A copy of said Notice of Removal filed with the United States District Court for the Southern District of Texas is attached hereto as Exhibit “A” and has been served on all counsel of record.

Respectfully submitted,

/s/ JUSTIN QUIN

Justin P. Quin (TX Bar #24103893)

Jones Walker LLP

811 Main St., Suite 2900

Houston, TX 77002

Telephone: 713-437-1877

Fax: 713-437-1949

Email: jquin@joneswalker.com

*Counsel for Defendant,
Tidewater Marine, LLC*

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on this 30th day of September, 2019, I served a true and complete copy of the foregoing pleading on all counsel by E-mail, facsimile, and/or by depositing same in the United States Mail, postage prepaid.

/s/ JUSTIN QUIN

JUSTIN P. QUIN